



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED

02-28-08
04:59 PM

Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework and to
Examine the Integration of Greenhouse Gas Emissions
Standards into Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

**COMMENTS OF THE SOLAR ALLIANCE ON THE INTERIM
OPINION ON GREENHOUSE GAS REGULATORY STRATEGIES**

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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.

Rulemaking 06-02-012
(Filed February 16, 2006)

COMMENTS OF THE SOLAR ALLIANCE ON THE INTERIM OPINION ON GREENHOUSE GAS REGULATORY STRATEGIES

Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, the Solar Alliance¹ submits these comments on the Interim Opinion on Greenhouse Gas Regulatory Strategies (Proposed Decision or PD) which makes recommendations to the California Air Resources Board (ARB) regarding implementation of Assembly Bill (AB) 32, which requires that statewide greenhouse gas (GHG) emissions be reduced to 1990 levels by 2020.

The Solar Alliance appreciates the opportunity to provide comments on this complex, yet vitally important issue of the implementation of AB 32, and the PD's recommendations regarding greenhouse gas emission associated with California's electric sector. The Solar Alliance appreciates the PD's recognition that determinations on the allowance framework and distribution of allowances are a critical to the success of the cap-and-trade

¹ The Solar Alliance is a national association of solar electric manufacturers, integrators, financiers and installers dedicated to accelerating the promise of solar energy in the United States, with a focus on fostering cost-effective policies and programs at the state level. Current members of the Alliance include American Solar Electric, Applied Materials, BP Solar, Conergy, Energy Innovations, Evergreen Solar, First Solar, Kyocera Solar, Mitsubishi Electric, MMA Renewable Ventures, PPM Solar, REC Solar, Sanyo Energy, Schott Solar, Sharp Electronics Corp.-Solar Energy Solutions Group, Solar City, Solaria, Solar Power Partners, Solar World, SPG Solar, Sun Edison, SunPower, Suntech, Trinity Solar, Uni-Solar and Xantrex.

system. The Solar Alliance looks forward to participating in future efforts at the Commission to establish a more detailed record on allocation distribution issues which will define the future success of California meeting its ambitious greenhouse gas emission reduction goals.

Our comments here focus on the following topics: (1) the Solar Alliance supports the PD's determination that market-based cap-and-trade mechanisms should be implemented in addition to mandatory provisions to reduce greenhouse gas emission via California's Renewable Portfolio Standard (RPS), energy efficiency programs, and greenhouse gas performance standards, and fully supports the PD's rejection of proposals to eliminate existing renewable and energy efficiency policies as California moves toward establishing complimentary carbon cap and trade mechanisms; (2) the Solar Alliance supports the PD's determination to establish the "deliverer" of electricity as the point of regulation under a greenhouse gas cap and trade program, and supports the determination that that zero-emission distributed generators deliver power to the grid. Based on these findings, zero-emission distributed generators should be expressly be included within the design of California's greenhouse gas cap-and-trade program as offering greenhouse gas emission reduction benefits.

I. **DISCUSSION**

A. **The Solar Alliance Supports the PD's Determination that AB 32 Implementation Include Greenhouse Gas Cap-and-Trade Mechanisms in Addition to California's Existing and Complimentary Energy Efficiency, Renewables, and Emissions Performance Standard Policies.**

The Solar Alliance firmly agrees with the PD's finding that "existing energy efficiency, renewables and emissions performance standard policies are the foundation upon which our other additional AB 32 policies should be built."² The Solar Alliance supports a continued and expanded Renewable Portfolio Standard (RPS) that operates in parallel to the AB

32 greenhouse cap-and-trade program. The Solar Alliance also supports the PD's recommendation that the California Energy Commission (CEC), ARB and Commission seek legislation that requires retail electricity providers to obtain a greater portion of their power from renewables by a date certain. The Solar Alliance believes that the RPS and other greenhouse gas reduction measures will be closely related in the future. The Solar Alliance looks forward to participating in further efforts at the Commission that will establish how photovoltaics (PV) will participate in RPS and compliance-driven greenhouse gas cap-and-trade markets.

B. The Solar Alliance Supports the PD's Determination that Electric Sector Participants Should be Regulated at the Point of Power Delivery to the grid for Purposes of Greenhouse Gas Cap-and-Trade Design and Support the Inclusion of High-carbon Out-of-State Power Providers and Zero-carbon On-site Power Providers in the definition of "Deliverer."

The Solar Alliance agrees with the PD's determination that a "deliverer" of electricity is the appropriate regulated entity for carrying out AB 32 mandates for the electricity sector in California.³ The Solar Alliance supports this determination as it will ensure that the carbon impact of out-of-state power imported into California, which represents 50% of the total carbon emissions from electricity sold and consumed within the California electric sector, are included within California's greenhouse gas cap-and-trade design. The Solar Alliance recognizes the complexity of the California power system and applauds the Commission for taking this important step in recognizing the interplay that different generation types have on the State's resulting greenhouse gas emission budget. Furthermore, the Solar Alliance agrees that "the deliverer point of regulation... applies uniformly to electricity consumed in California and electricity generated in California."⁴ The Solar Alliance fully supports the PD's determination

² PD at p. 30.

³ See PD at pp. 65-66.

⁴ PD at p. 70.

that on-site zero-emission power production meets the definition of electricity “deliverers” and, therefore, should be expressly recognized in the design of California’s greenhouse cap-and-trade program.⁵

PV electric generation levels are measurable and verifiable and associated emission reductions can easily be integrated into cap-and-trade mechanism, once there is agreement on standard avoided emissions calculations. The cap-and-trade rules, including issues related to allowances, must be designed to allow least-cost carbon reduction over the life of the program. To do so, the cap-and-trade rules must encourage market innovation and new market entrants. Encouraging broad market participation, as opposed to establishing new market barriers, should be the point of a market driven cap-and-trade program. Since on-site generation is largely funded by the customer, this investment in zero-emission electric generation should be captured and rewarded within the cap-and-trade program design. Careful consideration must be given to market structures and allocations in order to ensure continued investment in customer driven renewables markets in addition to IOU procurements markets. Assigning PV distributed generators a place in the cap-and-trade program is also consistent with the goal of “reducing GHG emissions and [changing] the way that electricity is generated and consumed.”⁶

Moreover, it is particularly vital that PV generators be brought in at the inception of this forming market precisely in order to bring about stability and ensure voluntary customer investments in PV, including business, government and residential customers, for the purposes of avoiding carbon emissions are not discouraged but rather are rewarded and encouraged as the State of California strives to meet its greenhouse gas emission reduction goals.

⁵ See PD at p. 66.

⁶ PD at p. 72.

II. CONCLUSION

The Solar Alliance appreciates the opportunity to present these comments on the PD and support approval of the PD as soon as possible. The Solar Alliance supports implementation of the greenhouse gas cap-and-trade program as an additional and complimentary program to California's existing RPS, energy efficiency programs and greenhouse gas performance adders. Furthermore, the Solar Alliance supports the definition of "deliver" as the point of greenhouse gas regulation under the cap-and-trade program. Zero-emission distributed generation fits within the definition of "deliver" and should be expressly included within California's cap-and-trade design. The Solar Alliance looks forward to participating in further proceedings on these critical policy and program design issues.

Respectfully submitted this February 28, 2008 at San Francisco, California.

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CERTIFICATE OF SERVICE

I, Lisa Vieland, certify that I have on this 28th day of February 2008 caused a copy of the foregoing

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ON GREENHOUSE GAS REGULATORY STRATEGIES**

to be served on all known parties to R.06-04-009 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 28th day of February 2008 at San Francisco, California.

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